

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK
MARY VAN BRUNT-PIEHLER,

Plaintiff,

v.

Civil Action No.
16-cv-6313

ABSOLUTE SOFTWARE, INC., ABSOLUTE
SOFTWARE CORPORATION, GEOFF HAYDON,
THOMAS KENNY, and TODD AWTRY,

Defendants.

PLAINTIFF'S STATEMENT OF CLAIMS TO BE PURSUED AT TRIAL

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Of Counsel: J. Nelson Thomas
Jonathan W. Ferris

Plaintiff intends to pursue the following claims at trial:

1. Sex discrimination in violation of Title VII, as alleged in the First Cause of Action of Plaintiff's Amended Complaint;
2. Age discrimination in violation of Age Discrimination in Employment Act, as alleged in the Second Cause of Action of Plaintiff's Complaint;
3. Unequal pay in violation of the Equal Pay Act; as alleged in the Third Cause of Action in Plaintiff's Amended Complaint;
4. Age and gender discrimination in violation of the New York State Human Rights Law; as alleged in the Sixth Cause of Action in Plaintiff's Amended Complaint;
5. Retaliation on the basis of gender in violation of the NYSHRL; as alleged in the Seventh Cause of Action in Plaintiff's Amended Complaint; and
6. Aiding and abetting discrimination and retaliation in violation of the NYSHRL, as alleged in the Eighth Cause of Action in Plaintiff's Amended Complaint.

Dated: July 12, 2021

THOMAS & SOLOMON LLP

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